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13 Attorneys for Defendant

14 ROWLAND MARCUS ANDRADE

15
16 IN THE UNITED STATES DISTRICT COURT

17 FOR THE NORTHERN DISTRICT OF CALIFORNIA

18
19 UNITED STATES OF AMERICA,

20 Plaintiff,

21 v.

22 ROWLAND MARCUS ANDRADE,

23 Defendant.

Case No. 3:20-CR-00249-RS

**DECLARATION OF KERRIE C. DENT
IN SUPPORT OF DEFENDANT
ANDRADE'S MOTION TO EXCEED
PAGE LIMIT FOR MOTION FOR NEW
TRIAL AND JUDGMENT OF
ACQUITTAL, AND FOR STIPULATED
REVISED BRIEFING SCHEDULE AND
HEARING DATE**

Judge: Hon. Richard Seeborg

1 Kerrie C. Dent, counsel for Defendant Marcus Andrade, states as follows:

2 1. I am one of the lawyers representing Defendant Marcus Andrade in the above-
3 captioned matter. I am licensed to practice law in the District of Columbia and the
4 Commonwealth of Massachusetts, and I am admitted *pro hac vice* in this case. Before filing a
5 motion to exceed the page limit for Mr. Andrade's Motion for New Trial and Motion for
6 Judgment of Acquittal, I reached out by email to AUSA Highsmith on May 19 and 20, 2025, and
7 then by phone to AUSA Ward on May 21, 2025.

8 2. In response to my May 19, 2025, email request that the government stipulate to
9 our filing a 45-page brief, the government responded by email dated May 20, 2025, that it
10 "take[s] no position one way or the other" on the request for a 45-page brief, but that it will
11 "need more time to respond given the length of [the proposed] brief." AUSA Highsmith asked if
12 we would agree to give the government an additional week to respond if the Court granted Mr.
13 Andrade's request to exceed the page limit.

14 3. I responded by email on May 20, 2025, that we would agree to give the
15 government an extra week for the government to oppose our post-trial motion, but that we then
16 also need to push the reply brief and hearing one week. The stipulated revised briefing schedule
17 would be:

18 Opp. Due – June 11, 2025

19 Reply Due – June 18, 2025

20 Hearing – June 24, 2025
21

22 4. The government agreed to the proposed revised schedule above (by both phone and
23 email) on May 21, 2025, provided that the schedule works for the Court.

24 I declare under penalty of perjury that the foregoing is true and correct, and that this
25 declaration was executed on May 21, 2025, in Watertown, New York.

26
27 /s/ Kerrie C. Dent
28 KERRIE C. DENT